

**Defendant's
Exhibit A**

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

AFFIDAVIT

v.

DIJON HARRIS

Docket No. 14-CR-177

Defendant.

STATE OF NEW YORK:)

COUNTY OF ERIE:)

CITY OF BUFFALO:)

DIJON HARRIS, being duly sworn, disposes and says:

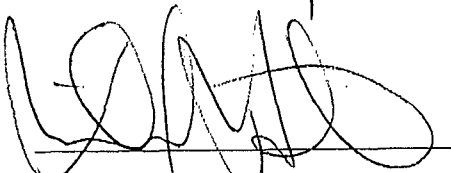
1. I am the Defendant in the above captioned action.
2. A search was executed at the address of 335 Hewitt Avenue, Buffalo, New York on September 5, 2014. I have spoken with my attorney, Michael M. Blotnik with regard to the issue contained therein.
3. At the time of the execution of the search warrant I lived at 335 Hewitt Avenue, Buffalo, New York and resided there for more than a year. As a result, according to my attorney, I have standing within which to request that the evidence seized therein be suppressed because I had reasonable expectations of privacy in the interior of the property.
4. On September 5, 2014 in the afternoon hours, police officers barged into my home. I was cuffed and placed into the prone position in a bedroom on the first floor. At some point, I was questioned about various items which officers advised me had been seized from the premises. The questions and my response to their questions took place after I was handcuffed. I was aware that I was in custody and was not free to leave or to move around in any way.
5. I have no recollection at all that any *Miranda* warnings were ever read to me prior to being interrogated. As a consequence, I am asking this Court to accept this affidavit and to order a hearing to determine the admissibility of any statements which are attributed to me.

WHEREFORE, your deponent prays that this Court rule accordingly.



DIJON HARRIS

Sworn before me this
24th Day of January 2015



NOTARY PUBLIC

MICHAEL M. BLOTNIK
NOTARY PUBLIC, State of New York
Qualified in Erie County
My Commission Expires September 30, 2017
Reg. No. 02BL4608173